

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

|                               |   |                               |
|-------------------------------|---|-------------------------------|
| EVELYN L. MCKINLEY,           | : | JURY TRIAL DEMANDED           |
|                               | : |                               |
| Plaintiff,                    | : | Civil Action No. 04-222 E     |
|                               | : |                               |
| vs.                           | : | Hon. Judge Sean J. McLaughlin |
|                               | : | Hon. Mag. Judge Susan         |
| HONORABLE LES BROWNLEE,       | : | Paradise Baxter               |
| ACTING SECRETARY OF THE ARMY, | : |                               |
|                               | : | Electronically Filed          |
| Defendant.                    | : |                               |

**PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME  
TO FILE OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

AND NOW, comes Plaintiff, Evelyn McKinley, by and through her counsel, Neal A. Sanders, Esquire, and Dirk Beuth, Esquire, of the Law Offices of Neal A. Sanders, and files this Motion for Enlargement of Time to File Opposition to Defendant's Motion for Summary Judgment and states as follows:

1. By Court Order, Plaintiff's Opposition to Defendant's Motion for Summary Judgment is due on or before Thursday, April 13, 2006.
2. In an unrelated matter, Plaintiff's counsel was called to trial in Butler, Pennsylvania during the week of April 3, 2006.
3. In another unrelated matter, Plaintiff's counsel has been called to trial in Kittanning, Pennsylvania during the week of April 17, 2006 and needs time to prepare for same.

4. Plaintiff's counsel on behalf of the Plaintiff in this matter respectfully asks for enlargement of time until Monday, April 17, 2006 to file Plaintiff's Opposition to Defendant's Motion for Summary Judgment.

WHEREFORE, Plaintiff prays this Honorable Court will grant this Motion and execute the attached Order.

RESPECTFULLY SUBMITTED,

LAW OFFICES OF NEAL A. SANDERS

Dated: April 12, 2006

By: /s/Neal A. Sanders  
Neal A. Sanders, Esquire  
PA Id. No. 54618  
Co-Counsel for Plaintiff,  
Evelyn McKinley

By: /s/ Dirk Beuth  
Dirk Beuth, Esquire  
PA Id. No. 76036  
Co-Counsel for Plaintiff,  
Evelyn McKinley

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